

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

KEITH RANIERE,

Plaintiff,

-against-

MERRICK GARLAND, ET AL.

Defendants.

Case No. 4:22-cv-00561-RCC

**MOTION TO REQUEST EXTENSION OF DEADLINE
TO FILE RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1. Plaintiff Keith Raniere, through his undersigned counsel, hereby moves to request the Court for an order granting a reasonable extension of the deadline to submit a Response in Opposition to Defendants' Motion for Summary Judgment related to the above-captioned case, which is currently due on July 31, 2023, to September 18, 2023 or any date thereafter that the Court deems acceptable.

2. The undersigned Counsel has conferred with Counsel for the Defendants. Defendants consent to Plaintiffs' request for an extension to file the Response in Opposition to Defendants' Motion for Summary Judgment.

3. This extension is sought to afford additional time for the undersigned counsel to engage in further consultation with Plaintiff, review the extensive factual and procedural history associated with this case, and incorporate the related matter filed under Case No. 4:22-cv-00212-RCC. This is the first request by the undersigned counsel on behalf of Plaintiff for an extension to file a Response in Opposition to Defendants' Motion for Summary Judgment. Barring any unforeseen circumstances, Plaintiff do not anticipate any further requests for an extension to file their Response in Opposition to Defendants' Motion for Summary Judgment.

4. Plaintiff has retained the undersigned counsel to represent him in this matter. The undersigned counsel was admitted *pro hac vice* in the United States District Court for the District of Arizona only on July 13, 2023 for the matter at issue.

5. The grounds for seeking the extension mainly rest on the fact that the undersigned counsel, Arthur L. Aidala, has been admitted *pro hac vice* only on July 13, 2023. The Response in Opposition to Defendants' Motion for Summary Judgment demands extensive evaluation and drafting. It is essential for the undersigned counsel to thoroughly examine the factual allegations, navigate the procedural history, and consult with the Plaintiff. As such, after careful consideration and based on prudent judgment, it has become evident that additional time is necessary to engage in meaningful consultation with Plaintiff regarding the intricate background of the case, with the ultimate objective of drafting a comprehensive and sufficient Response in Opposition to Defendants' Motion for Summary Judgment. Therefore, the undersigned counsel respectfully requests the Court for a reasonable extension to file the Response.

6. Based on the foregoing, Plaintiff respectfully requests the date to file his Response in Opposition to Defendants' Motion for Summary Judgment be extended to September 18, 2023 or any date thereafter that the Court deems convenient.

Date: July 26, 2023

Respectfully submitted,

/s/ Arthur L. Aidala
Arthur L. Aidala, Esq.
Aidala, Bertuna & Kamins, P.C.
8118-13th Ave.
Brooklyn, NY 11228
(718) 238-9898
aidalaesq@aidalalaw.com